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Attorneys for Plaintiffs,

TONY CLARK and PAMELA ELY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TONY CLARK and PAMELA ELY,

Plaintiffs,

v.

**FORD MOTOR COMPANY, a
Delaware corporation; Does 1 through
10, inclusive**

Defendants.

**Case No.: 2:22-cv-03069-SVW-
GJS**

(Removed from Superior Court of
California, County of Los Angeles,
Case No. 22STCV11319)

**DECLARATION OF PHIL A
THOMAS IN SUPPORT OF
PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
REMAND TO SUPERIOR
COURT OF CALIFORNIA**

*Assigned for All Purposes to the
Honorable **Stephen V. Wilson***

Date: July 11, 2022

Time: 1:30 p.m.

Courtroom: 10A

Action Filed: April 1, 2022

1 I, Phil A Thomas, declare as follows:

2 1. I am an attorney admitted to practice before the United States District
3 Court for the Central District of California. I am an attorney at Knight Law Group,
4 LLP, and counsel of record for Plaintiffs Tony Clark and Pamela Ely (“Plaintiffs”)
5 in the above-captioned matter.

6 2. I have personal knowledge of the facts set forth herein and could testify
7 competently if called upon to do so.

8 3. On May 20, 2022, I met and conferred with Defendant’s counsel by
9 email and phone regarding remanding the case to state court in light of FCA’s failure
10 to meet its burden that the amount in controversy had been met to establish diversity
11 jurisdiction. However, we were unable to reach a resolution.

12
13 I declare under penalty of perjury under the laws of the United States of
14 America that the foregoing is true and correct and that this declaration was executed
15 on May 31, 2022 in Oakland, California.

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19 /s/ Phil A Thomas
20 Phil A Thomas
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